

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA	§	
	§	
vs.	§	
	§	CRIMINAL NO. 4:24-CR-580
[1] Francisco Jaramillo-Valdovinos, <i>et al.</i>	§	
	§	
<i>Defendants.</i>	§	

THIRD JOINT STATUS REPORT ON DISCOVERY

Pursuant to the Court's order dated February 7, 2025 (Docket No. 233), this joint status report is filed by the United States and Defendants [9] Nabeel Iqbal, [10] Asad Wali Kesaria, [11] Yossio Resendez, [12] Lorena Araquistain, [14] Victor Garcia-Cisneros, [16] Cliserio Najera-Valenzuela, [17] Marcos Pineda-Mendoza, [19] Abel Delgado-Rojas, [20] Rogelio Zuniga-Reyes, [21] Yonatan Duarte-Garcia, [25] Mayco Jaimes, [26] Marcos Antonio Zapata, [28] Kalle Robert Cort, [29] Jose Hernandez-Olvera, [30] Jesus Horacio Garza, [31] Enio Gonzalez-Barreto, [32] Brandy Nikoll Meadows, and [33] Othoniel Gonzalez II, by and through their respective counsel.

Procedural Background

On November 7, 2024, a sealed indictment was returned in this matter, charging 34 defendants in Count One with Conspiracy to Launder Monetary Instruments, in violation of 18 U.S.C. §§ 1956(a)(1)(B)(i) and 1956(h). Several defendants were named on additional counts of Laundering Monetary Instruments, in violation of 18 U.S.C. §§ 1956(a)(1)(B)(i) and 2, and/or Possession with Intent to Distribute Cocaine/Heroin/Alprazolam, in violation of 21 U.S.C. § 841(a) and (b).

Beginning on or about January 23, 2025, all but 11 defendants¹ were arrested on the pending charges and either retained or were appointed counsel.

The Court designated the case complex on February 7, 2025, and vacated all dates in the scheduling order. The Court ordered the parties to submit a joint status report on discovery every 90 days, beginning in May 2025. Doc. No. 233. The parties filed the first Status Report on May 9, 2025, Doc. No. 284, and the Second Status Report on August 7, 2025, Doc. No. 315.

Status of Discovery

To facilitate the dissemination of discovery to court-appointed counsel in this complex, multi-defendant case, the Court appointed Russell M. Aoki of Aoki Law PLLC as the Coordinating Discovery Attorney on February 26, 2025. Docket No. 257. He has agreed to provide the discovery to retained counsel if they provide him with blank drives.²

To date, Mr. Aoki has received three rounds of general discovery from the United States, which he has prepared for dissemination to defense counsel. All court-appointed defense counsel received the first round of discovery in April and May 2025. All but three retained counsel provided blank drives and received a copy of the first production.³ As of the date of this filing, the

¹ The 11 fugitive defendants are: [1] Francisco Jaramillo-Valdovinos; [2] Angelberto Quezada-Mejia; [3] FNU LNU a/k/a “Horacio;” [4] Alejandro Olmeda-Rodriguez; [5] Joel Quezada-Reyes; [6] David Mejia-Quezada; [7] Jaime Hugo Sanchez; [8] Diego Gonzalez-Rosales; [13] Aguilero Duarte-Chavez; [15] Primo Hernandez-Garcia; and [18] Juan Contreras-Morales.

² The following defendants retained counsel: [9] Nabeel Iqbal, [10] Asad Kesaria, [12] Lorena Araquistain, [21] Yonatan Duarte-Garcia, [22] Diego Macentyre-Rodriguez, [23] Andres Ramirez-Duarte, [24] Norberto Coronado-Mata, [28] Kalle Robert Cort, [30] Jesus Horacio Garza, [31] Enio Gonzalez-Barreto, [33] Othoniel Gonzalez II, and [34] Cristian Alexis Garza.

³ Mr. Aoki did not receive drives on behalf of [9] Nabeel Iqbal, [21] Yonatan Duarte-Garcia, or [30] Jesus Horacio Garza.

undersigned has received emails from the three retained counsel that they are in the process of shipping external drives to Mr. Aoki.

Production of the second round of discovery was shipped to court-appointed counsel by Mr. Aoki's firm on October 1, 2025. Retained counsel were informed they would receive copies once his firm received blank drives. Mr. Aoki's firm has not received blank drives from any of the retained counsel.

According to Mr. Aoki, the dissemination of the third round of discovery is likely to begin during the first week of November 2025. Retained counsel have been asked to provide a blank drive.

In addition to the general discovery disseminated through Mr. Aoki, the Government made a defendant-specific production, consisting of 1.5 terabytes of data, to [9] Nabeel Iqbal on October 15, 2025.

Finally, the Government is preparing to submit a fourth round of general discovery to Mr. Aoki, which is estimated to consist of no more than 20 GB of data. Once received and processed, Mr. Aoki will make the discovery available to defense counsel.

Conclusion

The discovery process in this complex, multi-defendant case remains ongoing. Once all discovery has been received, the defense will require time to review the discovery, to consider any plea offers from the Government, to decide whether to file any pretrial motions, and/or to prepare for trial.

The Government and all defense counsel listed in the Certificate of Conference below agree that no trial settings or trial-related deadlines should be imposed at this time. The parties will update the Court on the status of discovery no later than February 3, 2026.

Respectfully submitted,

NICHOLAS J. GANJEI
United States Attorney

By: /s/ Stephanie Bauman
Stephanie Bauman
Assistant United States Attorneys
U.S. Attorney's Office, S.D. Texas
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CERTIFICATE OF CONFERENCE

I hereby certify that I attempted to confer with all defense counsel of record in this case, with the exception of counsel for defendants who have been sentenced. The counsel listed below have each approved this status report and authorized the filing of the status report as joint.

Sina Zadeh
Counsel for [9] Nabeel Iqbal

David Adler
Counsel for [17] Marcos Pineda-Mendoza

Nathan Mays
Counsel for [10] Asad Wali Kesaria

Javier Martinez
Counsel for [19] Abel Delgado-Rojas

Kimberly McTorry
Counsel for [11] Yossio Resendez

Mark Diaz
Counsel for [20] Rogelio Zuniga-Reyes

Stephen St. Martin and Emmett Leeper
Counsel for [12] Lorena Araquistain

Erin Epley
Counsel for [21] Yonatan Duarte-Garcia

J. A. Salinas
Counsel for [14] Victor Garcia-Cisneros

Molly Bagshaw
Counsel for [25] Mayco Jaimes

Ali Fazel
Counsel for [16] Cliserio Najera-Valenzuela

Adrian Almaguer
Counsel for [26] Marcos Antonio Zapata

Billy Morian and Reagen Thomas
Counsel for [28] Kalle Cort

Mario Madrid
Counsel for [31] Enio Gonzalez-Barreto

Anuj Shah
Counsel for [29] Jose Hernandez-Olvera

Paul Morgan
Counsel for [32] Brandy Meadows

Juan Guerra
Counsel for [30] Jesus Horacio Garza

Chip Lewis
Counsel for [33] Othoniel Gonzalez II

/s/ Stephanie Bauman
Stephanie Bauman
Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing will be served on all counsel
of record upon filing with ECF.

/s/ Stephanie Bauman
Stephanie Bauman
Assistant United States Attorney